



Tetra Tech EM Inc.

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June 30, 1998

Mr. Michael Bellot
 Work Assignment Manager
 U.S. Environmental Protection Agency Region 5
 77 West Jackson Boulevard
 Chicago, IL 60604

EPA Region 5 Records Ctr.



248079

**Subject: Technical Review Comments on
 Revised Draft Operations and Maintenance Plan
 DuPage County Landfill Site, DuPage County, Illinois
 Contract No. 68-W7-0003, Work Assignment No. 015-RXBF-056Y**

Dear Mr. Bellot:

Tetra Tech EM Inc. (Tetra Tech) has completed its technical review of the revised draft operations and maintenance plan (OMP) for the DuPage County Landfill site in DuPage County, Illinois. The revised draft OMP, which is dated May 1998, was prepared by Montgomery Watson for the Forest Preserve District of DuPage County.

Tetra Tech reviewed the revised draft OMP to assess (1) whether the U.S. Environmental Protection Agency (EPA) comments dated February 25, 1998, on the draft OMP had been adequately addressed and (2) whether any additions to the OMP were technically adequate. Tetra Tech's review indicates that, except for the minor issues discussed in the comments below, the revised draft OMP adequately addresses EPA's comments and the additions made are technically adequate.

In the following comments, the first full paragraph on a page of the revised draft OMP is identified as "Paragraph 1," and a paragraph carried over from a previous page is identified as "Paragraph 0."

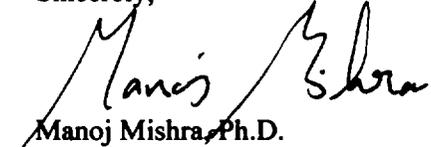
1. **Section 2.1.1, Page 2-1, Paragraph 3, Lines 6 and 7; Section 5.1.1, Page 5-1, Paragraph 4, Line 8; and Section 7.1, Page 7-2, Paragraph 1, Lines 1 and 2.** The text refers the reader to Drawings 2 and 7 for the locations of the security fences, vaults, and signs; however, these locations are not shown in Drawings 2 and 7. Drawings 2 and 7 should be revised to show the locations of the security fences, vaults, and signs.
2. **Section 2.1.2, Page 2-1, Paragraph 5, Lines 4 and 5.** The text states that the access roads are shown in Figure 2 and Drawing 1; however, the access roads are shown in Drawing 1 only, and Figure 2 is not included in the OMP. The text should be revised to refer only to Drawing 1.
3. **Section 3.2.1, Page 3-2, Paragraph 0, Line 1.** The phrase "continue for one month after the repairs are complete." should be revised to read "continue during and following repairs until there is no evidence of further deterioration or need for additional repair."
4. **Section 3.3.1, Page 3-3, Paragraph 3, Lines 3 and 4.** The phrase "annually after" should be revised to read "annually and after" and the phrase "event to" should be revised to read "event and a significant thawing event to" in order to identify any differential settlement in a timely manner.

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5. **Section 4.1.2, Page 4-1, Paragraph 5, Line 4.** The text refers the reader to Drawings 2 through 4 for wellhead details; however, the wellhead details are shown in Drawing 3 only. The text should be revised to refer only to Drawing 3.
6. **Section 4.1.6, Page 4-3, Paragraph 1, Line 6 and Section 4.1.7, Page 4-3, Paragraph 2, Line 9.** The text refers the reader to Appendix C for additional operation and maintenance information supplied by the manufacturer; however, Appendix C is not included in the revised draft OMP. The OMP should be revised to include Appendix C.
7. **Section 5.2.1, Page 5-2, Paragraph 5, Line 3 and Section 5.2.2, Page 5-3, Paragraph 1, Line 5.** The text refers to obtaining information on the rates at which landfill gas (LFG) is being vented from various vents and the quantity of LFG that is being vented. However, it is unclear how these parameters will be measured because no flow metering devices are connected to the LFG vents. The text should be revised to specify the instruments and procedures that will be used to measure LFG venting rates and the quantity of LFG vented. Also, refer to the February 25, 1998, EPA comment on Section 5.2.2.
8. **Appendix B, Landfill Gas Vent Monitoring Form.** To avoid confusion, a footnote should be added to this form in order to explain that gas vents DV-1 and DV-12 are not listed because DV-1 has been abandoned and DV-12 is outside the limits of refuse.

If you have any questions about Tetra Tech's technical review of the revised draft OMP, please call me at (312) 856-8721.

Sincerely,



Manoj Mishra, Ph.D.
Site Manager

cc: Diane Spencer, EPA Project Officer
Marguerite Hendrixson, EPA Contracting Officer
Majid Chaudhry, Tetra Tech
Jill Ciraulo, Tetra Tech